

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Title V Draft Permit No. V-99-006

HAWLEY PRODUCTS, INC.

PADUCAH KY.

May 11, 2000

JOHN JUMP, REVIEWER

Plant I.D. # 072-2460-0081

Application Log # F482

**SOURCE DESCRIPTION:**

Hawley Products mixes a paper slurry. Paper speaker cones are molded from the slurry and then dried. Hawley uses both electric and natural gas cone dryers. The cones are spray and dip coated to enhance the appearance and properties of the paper. The coated cones are dried by the indirect fired cone treatment oven. Cloth is treated with chemicals to make it rigid. The cloth is dried in the indirect fired cloth treatment oven. Cloth and/or a gasket is attached to the edge of the larger cone body opening. Hawley trims the cone body and cloth prior to adhering them together.

**COMMENTS:**

**Emission Factors and their Source**

Cone and Cloth Treatment Ovens:

All regulated pollutants contained in the treatment chemicals used are assumed to be emitted during oven treatment.

Wetlook Spray Booths Nos. 1 & 2:

All regulated pollutants contained in the treatment chemicals used are assumed to be emitted.

Volatile Liquid Storage Tanks:

Tank emissions were determined using TANKS Program 3.1. This program performs calculations according to EPA's AP-42.

Natural Gas Boilers:

Boiler Emissions were calculated according to EPA's AP-42 Emission factors.

Direct Natural Gas Cone Dryers:

Emissions were calculated using EPA's AP-42.

## Applicable Regulations

Natural Gas Boilers The potential to emit (PTE) or actual emissions of sulfur dioxide and particulate from a natural gas boiler are less than five percent of their respective allowable emission rate taking into account the most stringent limitations. There are no controls with this type of boiler. All other pollutants from this size boiler meet the criteria for insignificant activity. Hawley's two Natural Gas Boilers have a rated capacity below 10 mmBtu/hr and are considered insignificant by the Permit Review Branch. According to 401 KAR 59:015, Section 4., particulate emissions shall not exceed 0.56 lbs/mmBtu actual heat input. Visible emissions shall not exceed 20% opacity. According to Section 5., sulfur dioxide emissions shall not exceed 3.0 lbs/mmBtu actual heat input.

Boiler	Potential Emissions (lbs/hr)		Standard (lbs/hr)
KY43605	SO <sub>2</sub>	0.001008	0.941
	PM	0.0202	5.04
KY35108	SO <sub>2</sub>	0.0181	0.85
	PM	0.00091	4.54

Cone Treatment Line 401 KAR 59:210 New fabric, vinyl and paper surface coating operations and 401 KAR 61:120 Existing fabric, vinyl and paper surface coating operations, do not apply to Hawley Products cone treatment line. According to the US EPA OAQPS document Control of Volatile Organic Emissions From Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light - Duty Trucks, a web is a continuous roll of paper. Hawley products coats individual speaker cones.

Cloth Treatment Line 401 KAR 59:210 New fabric, vinyl and paper surface coating operations, does not apply to Hawley Products cloth treatment line. The cloth treatment oven was installed prior to the effective date of this regulation

02 Wetlook Spray Booths 401 KAR 59:010 applies to the particulate matter emissions from the two wetlook spray booths. Pursuant to Regulation 401 KAR 59:010, emissions of particulate matter shall not exceed 2.34 lb/hr/booth and the opacity of visible emissions shall not equal or exceed 20 percent from the wetlook spray booths. Uncontrolled potential particulate emissions at the spray booths total 1.1 lb/hr. Particulate emissions from these two spray booths are uncontrolled. Hawley Products considers their spray booths to be a bottle neck operation. Hawley Products utilizes their spray booths at as great an hourly capacity as they can in order to keep up the production capacity of the rest of their facility. Since the calculated uncontrolled emission rate is less than the allowable, compliance with 401 KAR 59:010 is obvious.

01 Cone Treatment Oven Dip Tanks 401 KAR 59:010 applies to the particulate matter emissions from the dip tanks used at the cone treatment oven. Pursuant to Regulation 401 KAR 59:010, emissions of particulate matter shall not exceed 2.34 lb/hr and the opacity of visible emissions shall not equal or exceed 20 percent from the dip tanks used at this oven. Uncontrolled potential particulate emissions at the dip tanks total 0.33 lb/hr. Since the calculated uncontrolled emission rate is less than the allowable, compliance with 401 KAR 59:010 is obvious.

10 Electric Oven Dip Tanks 401 KAR 59:010 applies to the particulate matter emissions from the dip tanks used at the electric treatment oven. Particulate emissions at the electric oven dip tanks are insignificant.

**Equipment not Permitted**

Hawley Products has a second Cloth Treatment Oven located next to the one that is listed on the permit. It has not been permitted.

**Trivial Activities**

The use of Oven Cleaner and Diverlite are trivial activities. Actual usage of Oven cleaner is 200 gallons per year for Hawley Products 4,000 hours of operation. Actual usage of Diverlite is 50 gallons per year. Diverlite is used to clean the molds used to form the cone bodies.

**PERIODIC MONITORING:****Specific Monitoring Requirements**

The permittee shall visually check for emissions from the following emissions points on a weekly basis.

Emission Point 01 (02) Cone Treatment Oven (Dip tanks)

Emission Point 02 (04)(06) Wetlook Spray Booths 1& 2

**Specific Recordkeeping Requirements**

The permittee shall record whether or not any visual emissions are observed in an operating log. This log shall be maintained and made available for inspection upon request.

**Specific Reporting Requirements**

Summary reports of weekly visual inspections shall be submitted as defined in General Condition F.5.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.